

# **Exhibit "B"**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DONALD BELL; KATRINA BELL, )  
Plaintiffs, )  
vs. ) CIVIL ACTION NO. 2:05 CV 658-T  
TRAVELERS PROPERTY CASUALTY )  
INSURANCE COMPANY, )  
Defendant. )

**AFFIDAVIT OF RICHARD STEED**

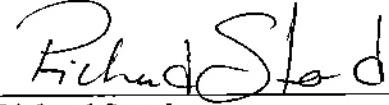
1. My name is Richard Steed. I am a resident of the State of Alabama and am over the age of (19) nineteen years. This affidavit is based on my personal knowledge and/or on business records maintained in the ordinary course of business.

2. I am the principle engineer with Professional Inspection Consultants, Inc. and am a licensed Civil Engineer. David Gibbs contacted me to inspect a home owned by Donald and Katrina Bell. This home is located at 9030 County Road 59, Pine Apple, Alabama, 36471.

3. On January 19, 2005, I inspected the 9030 County Road 59, Pine Apple, Alabama property. My inspection was limited to an inspection of the home located on this property.

4. Attached to this affidavit is a copy of the January 27, 2005 report that I prepared following my inspection. This report is a business record maintained in the ordinary course of business and it accurately reflects my investigation of the subject property. I swear and affirm that the statements made in this report are true and correct.

STATE OF ALABAMA  
COUNTY OF Jefferson

  
Richard Steed

STATE OF ALABAMA  
COUNTY OF Jefferson

I, Laura Jemison, a Notary Public in and for said County and State, hereby certify that Richard Steed, whose name is signed to the foregoing and who is known to me, acknowledged before me this day, that being informed of the contents thereof, he voluntarily executed the same on the day of its date.

Given under my hand and seal this the 10<sup>th</sup> day of February, 2006.

Notary Public:

My commission expires: 10-25-06



**Water Damage Investigation  
Bell Residence  
Pine Apple, Alabama**

**For**

**Travelers Insurance  
Emerson, Georgia  
Claim No. L5K6586**

**By:**

**Professional Inspection Consultants, Inc.  
Decatur, Alabama**

**PIC Project No. A-100**

**January 27, 2005**

Professional Inspection Consultants, Inc.  
P.O. Box 1313  
Decatur, Alabama 35602



P.O. Box 1313  
Decatur, AL 35602

Mississippi  
Alabama  
Tennessee

January 27, 2005  
Project No. A-100

Mr. David Gibbs  
Travelers Insurance  
PO Box 840  
Emerson, GA 30137

Dear Mr. Gibbs:

**RE: Water Damage Investigation  
Subject Property Location:**

Bell Residence  
9030 CR 59  
Pine Apple, Alabama  
Claim No. L5K6586

Further to your request, we have inspected the above-mentioned premises. The results of our inspection are presented herein.

**Background Information:**

In September 2004, strong winds and storms associated with hurricane Ivan swept through south central Alabama. Mr. Donald Bell reported damage to his home in Pine Apple, Alabama from the storm events. Mr. Bell believes that his home received water damage in multiple areas causing damage throughout his home. Travelers Insurance was contacted and requested to further evaluate the damaged to the house.

Professional Inspection Consultants, Inc. was retained by Travelers Insurance to provide opinions on the extent of damage associated with the storm event.

**Purpose and Scope:**

The scope of work consists of an on-site inspection of the property and a written opinion on the cause and origin of damage reported and the likelihood the damage was caused from the recent storm events associated with hurricane Ivan. Prickett-Hamner Electric, LLC., was retained by PIC, Inc. to assist in the evaluation of electrical service in the house.

**Results of Investigation:**

A visual inspection was performed around 10:00 a.m. on Wednesday, January 19, 2005. Mr. Derrick Bell, Owners Son, was present during our inspection to show us the premises. Mr. David Gibbs, Travelers Insurance, Building Contractor, Gulf States Construction, and Danny Hamner, Prickett - Hamner Electric, LLC. were also present to review respective areas of concern. In general, the inspection revealed the following:

Mr. David Gibbs  
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### **Subject Property**

The subject property is a two-story house approximately 150 years old built on a convention foundation. It is our understanding that the home has been renovated in the last five year to it's present condition. General repairs noted during renovations were upgrades to the heating and cooling systems, foundation leveling, cosmetic and upgrades to the interior, and various ground improvements. For purposes of this report, directions noted are in relation to views from the front of the home.

### **Interior of the premises**

In general the floors, walls and ceilings were constructed from wood planks and boards. We believe the materials observed were part of the original construction of the home. Additionally, we do not believe the walls are insulated as this would not have been customary during this time period. Specifically, the following was noted:

#### **1<sup>st</sup> Floor**

1. The walls appeared to have been sealed and painted recently. The joints in the boards appeared to have been caulked. The boards in general were buckled slightly and cupped in most areas. In some areas we noted caulk protruding from joints at corners and between boards. We believe this has been caused from temperature differences created in the home since the upgrades to the heating and cooling systems. This is typical in older homes that are not energy efficient or which do not have insulated wall cavities.
2. We noted evidence of water seepage onto the ceiling in the right main room near the right rear corner. We believe this seepage occurred from water entering around the 2<sup>nd</sup> floor window in this area. It is possible the water could have ran down from the damaged roof above this area.
3. We noted the other ceiling areas to not have water stains or any apparent physical damage from roof leaks. We noted the ceiling boards to be buckle slightly and cupping. Expansion and contraction in the materials is occurring which has opened some joints. We believe this is being caused from similar conditions as noted in item No.1.
4. We noted the wood floors to be in good condition. Some floor areas have been repaired with wood filler. We did not observe any water damage to the floors although the wood planking is cupped in some areas. The joints in the planks have been sealed throughout with no newer movement noted. We believed the cupping and slight buckling has been present for an extended period of time.
5. We noted a newer area of flooring around the fireplace in the right main room. No damage was noted in this area.
6. We noted water damage to the ceiling in the kitchen above the cabinets. We believe this could have blown in under the flashing over this area during the storm event. No damage to the walls, floors, or cabinets was noted in this area.
7. We noted an older ceiling repair above the fireplace in the left main room. No newer damage was noted to this area.
8. We noted the paint blistering in the rear center bathroom and some mildew on the ceiling. We believe this is from general use and not associated with the storm events.

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9. We noted the front foyer and rear access area to be similar to those described in item No.1. The ceiling in the rear access area is discolored along the joints. This appears to be from absorption of the paint material.

#### **2<sup>nd</sup> Floor and Stairway**

10. We noted these walls to be similar as noted on the 1<sup>st</sup> floor. We did not note any water damage to the walls except under the rear right window in the right bedroom. The damage to the wall board in this area appeared older since the plank cracks had been sealed.
11. We noted evidence of water seepage onto the ceiling in about a 4'x8' area in the right bedroom near in the right rear corner. We believe this seepage occurred from water entering from damage to the roof during the recent storm event. No damage to the floor was noted in this area.
12. Other ceiling and floor areas appeared to be similar as noted on the 1<sup>st</sup> floor.
13. We noted the brick hearth to the fireplace in the left bedroom to be uneven. We noted ceiling repairs under this area on the 1<sup>st</sup> floor and no movement in the ceiling was noted. We believe that the sand base the bricks are set on was removed or leaked out during the repairs to the ceiling. This area can be leveled by adding masonry sand back as the base.
14. We noted a gap between the wood fireplace mantels and the walls in each bedroom. The gaps had been caulked at sometime indicating the gap has been present for a while. The gaps have re-opened at this time. We believe this was caused from shrinkage of the caulk material and is not associated with the storm event.

#### **Exterior and Crawlspace of Premises (Main House)**

1. We noted wind damage to trees, out buildings, and fences in the vicinity of the house.
2. We noted damage to the metal roof above the 2<sup>nd</sup> floor at the rear right corner of the home and at the center of the 2<sup>nd</sup> story roof in the front where the metal roof was pulled up slightly.
3. We did not note any pulled off siding or damage to the exterior walls. No movement to the chimneys was noted.
4. We inspected the crawl space of the home and noted that the home had been recently leveled. There were newer foundation block supports and floor joists in-place indicating recent repairs. The repairs appeared to be from one side to the other of the crawlspace.
5. We noted areas of deterioration to older floor joist from insect infestation. Some joists were noted to have broken from the deterioration and had been repaired with a newer joist. The worse damage appeared to be in the front right quadrant of the house.
6. We noted the outer sill to be very deteriorated from insect infestation at the right front corner. The sill appeared to have dropped in this area from the deterioration. Newer foundation supports had been added in this vicinity.
7. We checked the plumbing underneath the home and did not note any movement from the recent storm event. Additionally, we noted no movement to leveling wedges or underlying supports from the recent storm event.

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**Attic of Premises**

1. The attic was inspected and damage was noted to the roof at the rear right corner. The metal roofing was pulled up in this area and apparent water intrusion onto the insulation was observed. The damage extended from the bottom of the roof towards the roof ridge about 6' and was about 24" in width from the end of the house.
2. We did not note any other areas in the attic that appear to be leaking or damaged from the storm. Generally, if roof leakage is occurring the blown insulation will matt up when exposed to water. No matted areas were observed.
3. We noted no water had been blow-in or dripping along the ridge vent.
4. We noted newer board siding on the left gable of the house. This appeared to have been replaced at sometime prior to the storm event.

**Electrical Review**

Review of the electrical system was conducted by Danny Hamner, Prickett-Hamner Electric, LLC. The following items were noted:

1. The water service for the house is provided by a water well in the front of the home. The Control Voltage Transformer for the pump was noted to be burned. This was most likely from a power surge during the storm event.
2. The light fixtures throughout the home are chandelier type fixtures with low wattage bulbs. The light exposure from the fixtures was dim. This is believed to be from the low wattage bulbs being used. No electric deficiencies were noted. To gain more light exposure a higher wattage bulb could be used or upgrades to the fixtures should be considered.
3. The main electrical service could not be checked due to no access to the bunkhouse/garage.
4. Random checks on the electrical receptacles were made. One GFI receptacle in the 2<sup>nd</sup> floor left bedroom near the sink was discovered to be not working.
5. No physical damage to the home was noted from lighting or other electrical problems. In general the house electrical system checked out okay.

**Conclusion:**

Based on our review of the premises, our opinions are as follows:

1. We believe the lifted metal roof in front center and damage to the metal roof at the rear right corner to be related to the storm event. We noted roof leakage only from the damaged area at the rear right corner of the roof. This is evident from our inspection of the attic space in this area.
2. We believe the water staining on the ceiling on the 1<sup>st</sup> and 2<sup>nd</sup> floors in the rear right portion of the house is most likely from the roof damage or water making its way under the 2<sup>nd</sup> floor window getting to the 1<sup>st</sup> floor ceiling. It is possible some of the staining on the 1<sup>st</sup> floor ceiling could be previous from leaks around the 2<sup>nd</sup> floor window but the recent roof leakage can not be ruled out. We did not note water damage to the walls or floor in this area. The damage to the wall under the 2<sup>nd</sup> floor window appears to be from previous leakage around the window. This is evident from the repairs made to the wood planking in this area.

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3. We believe the ceiling damage in the kitchen was caused from water blown under the flashing above this area and leaking onto the ceiling. We did not note damage to the walls, floor, or cabinets in this area.
4. In our opinion, the house did not obtain significant damage associated with the storm event. The walls, ceilings, and flooring appeared to have been refinished recently. The boards in general were buckled slightly and cupped in most areas. In some areas we noted caulk protruding from joints at corners and between boards. We believe the buckling and cupping has been caused from temperature differences created in the home since the upgrades to the heating and cooling systems. This is typical in older homes that are not energy efficient or in which do not have insulated wall cavities.
5. We believe the home has had foundation issues in the past since we noted that the home had been recently leveled. There were newer foundation block supports and floor joists in-place indicating recent repairs. We noted areas of deterioration to older floor joist and sills from insect infestation and a possible drop in the foundation towards the front right associated with this damage. This is discussed in more detail above.
6. We checked the plumbing underneath the home and did not note any movement from the recent storm event. Additionally, we noted no movement to leveling wedges or underlying supports from the recent storm event.
7. Review of the electrical system was conducted by Danny Hamner, Prickett-Hamner Electric, LLC. The water service for the house is provided by a water well in the front of the home. The control voltage transformer for the pump was noted to be burned. This was most likely from a power surge during the storm event.
8. No other electric problems associated with the storm event were noted. Random checks on the electrical receptacles were made. One GFI receptacle in the 2<sup>nd</sup> floor left bedroom near the sink was discovered not to be working. The main electrical service could not be checked due to no access to the bunkhouse/garage. No physical damage to the home was noted from lighting or other electrical problems. Other items noted about electrical issues is listed above

If you have any questions about the conclusions contained in this report, please feel free to call. Our services were performed using the degree of skill normally exercised by practicing Consulting Engineers in this and similar locales. No other warranty is either expressed or implied. All conclusions were based on visual examination only.

Sincerely,  
PROFESSIONAL INSPECTION CONSULTANTS, INC.

*Richard W Steed*  
Richard W. Steed, P. E.

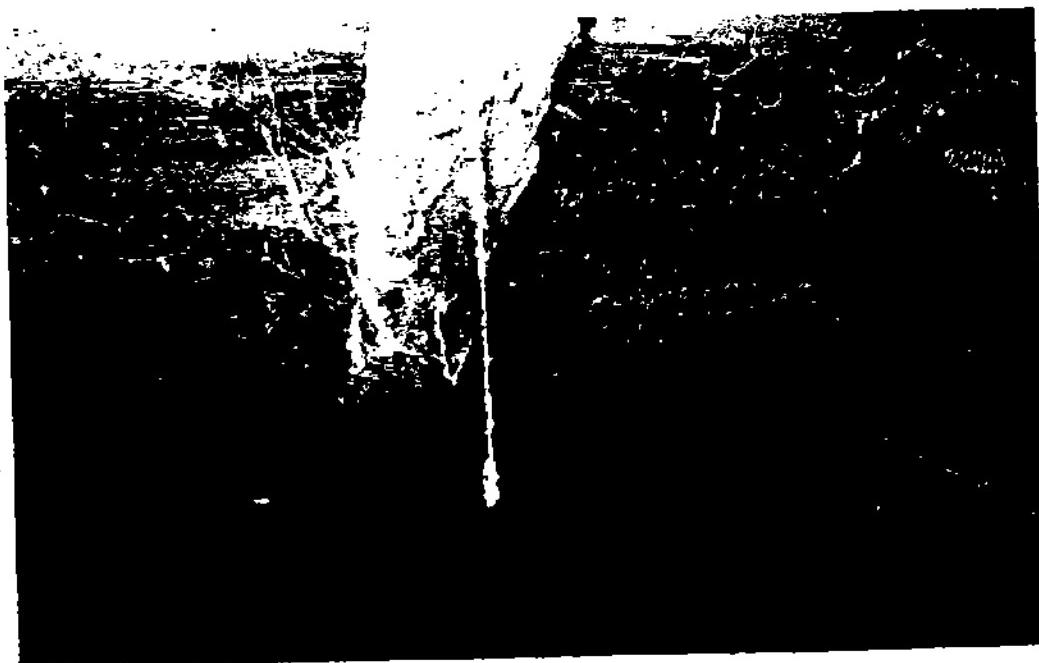
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Decatur, Alabama

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Picture No. 1 – Front view of Bell Residence. Notice raised metal roofing in center 2<sup>nd</sup> story.



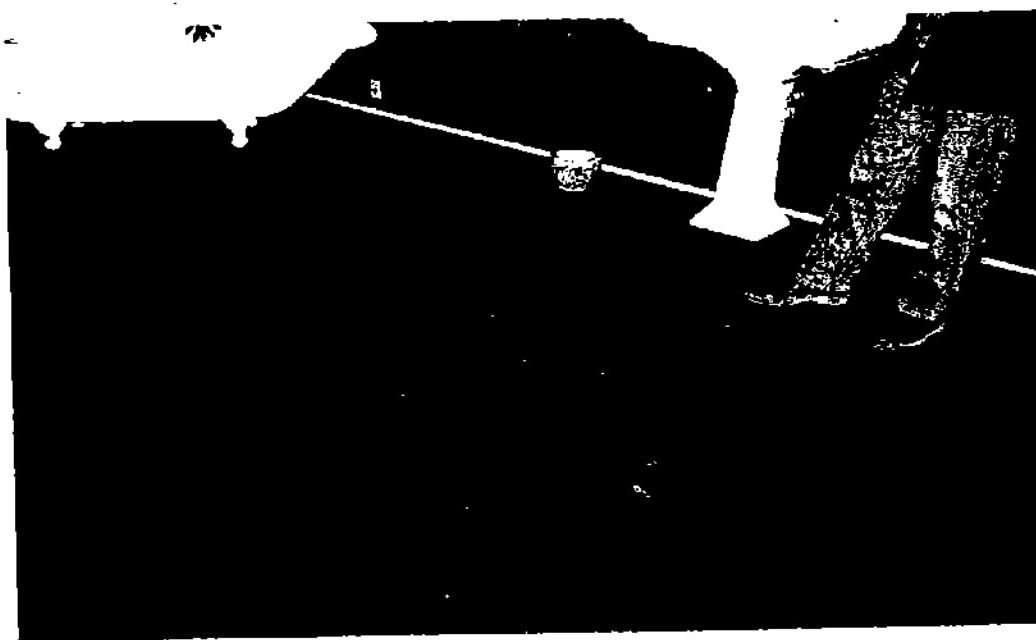
Picture No. 2 – Roof leak in attic from damaged metal roof. Location rear right corner.

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Picture No. 3 – Typical view. Staining on planks are not recent leakage.



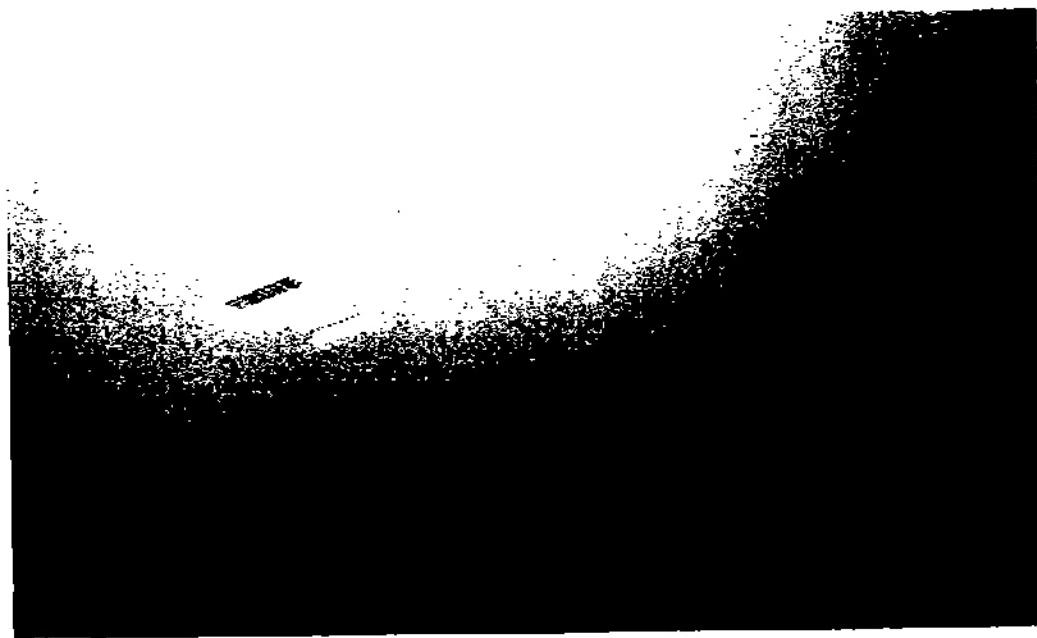
Picture No. 4 – Typical view of buckle floor and cupping. No water damage noted. 2<sup>nd</sup> Floor Left Bedroom.

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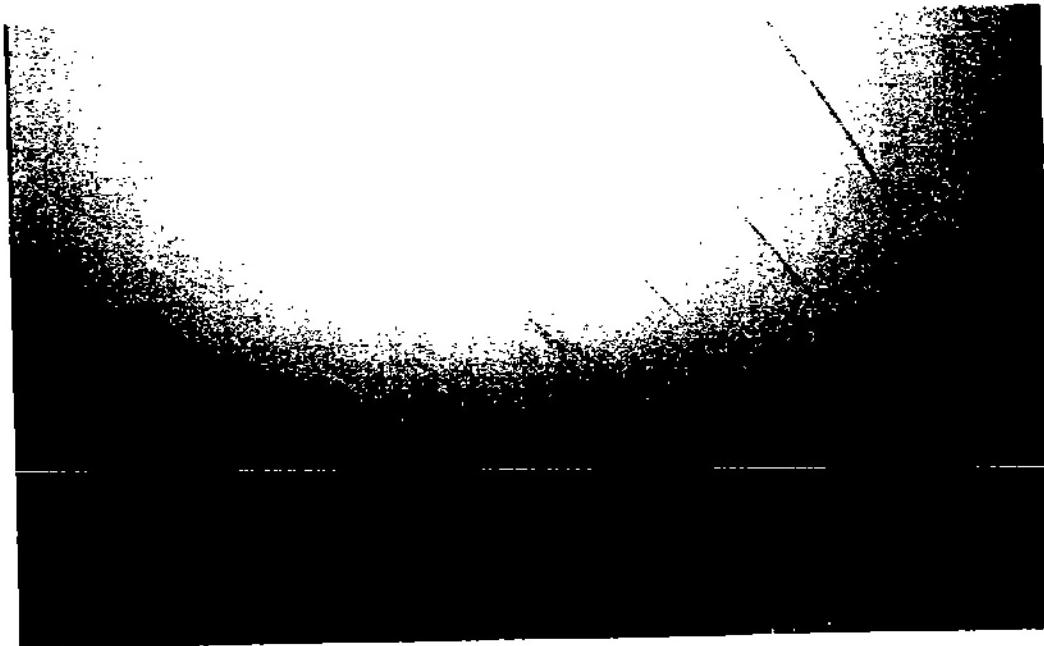
Picture No. 5 – View of brick front to fireplace in 2<sup>nd</sup> Floor Left Bedroom. Uneven brick.



Picture No. 6 – Typical view of ceiling. Some separation at joints.

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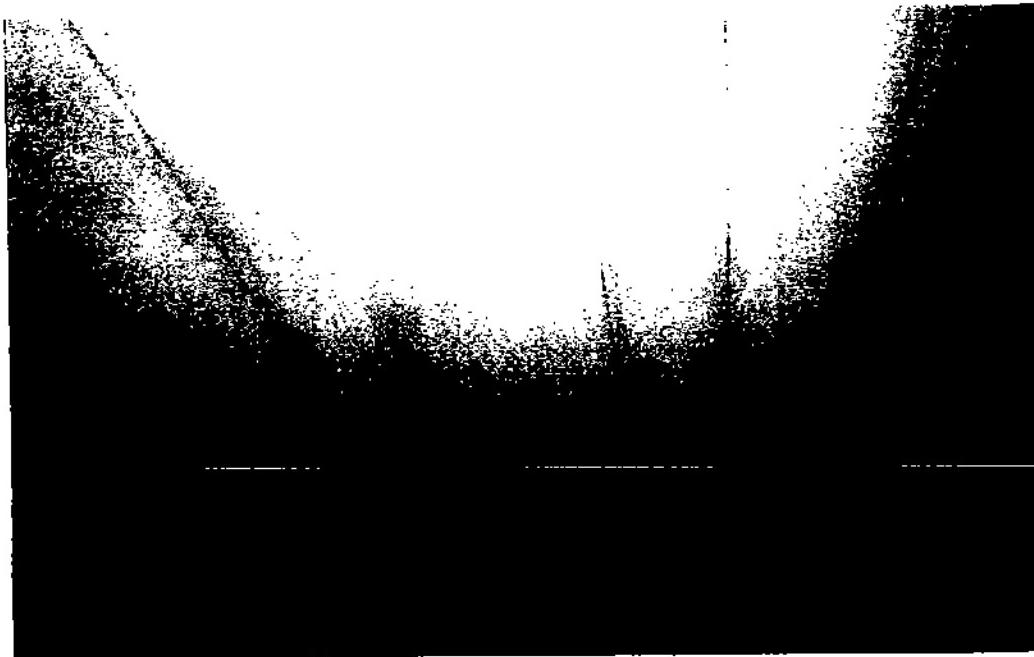
Picture No. 7 – Water damage to ceiling 2<sup>nd</sup> floor right bedroom. Location is at rear right corner.



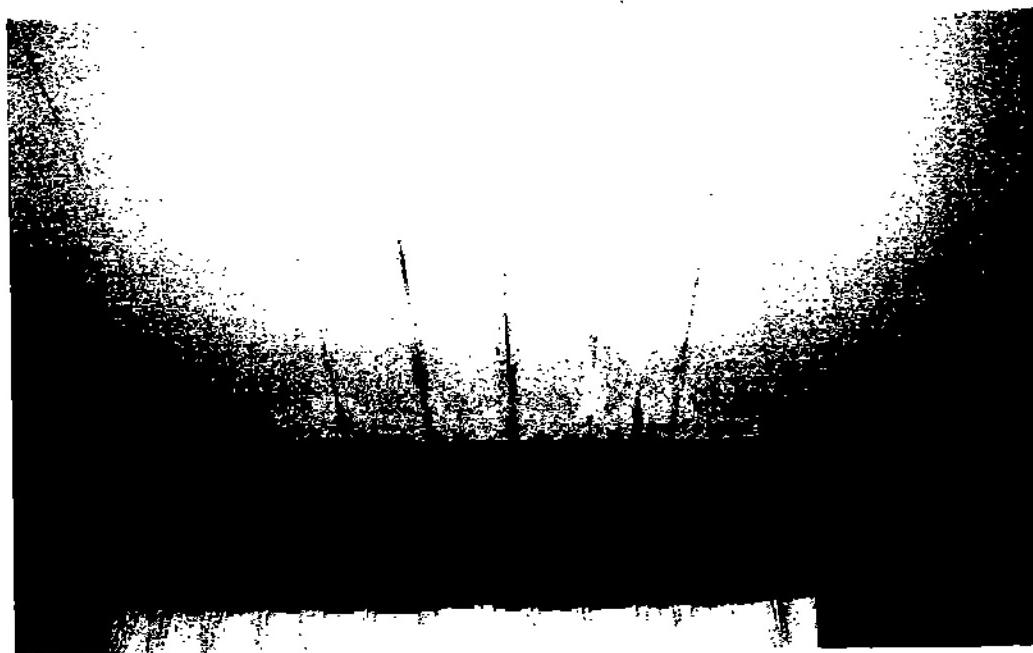
Picture No. 8 – Previous water damage to wall under window in 2<sup>nd</sup> floor right bedroom.

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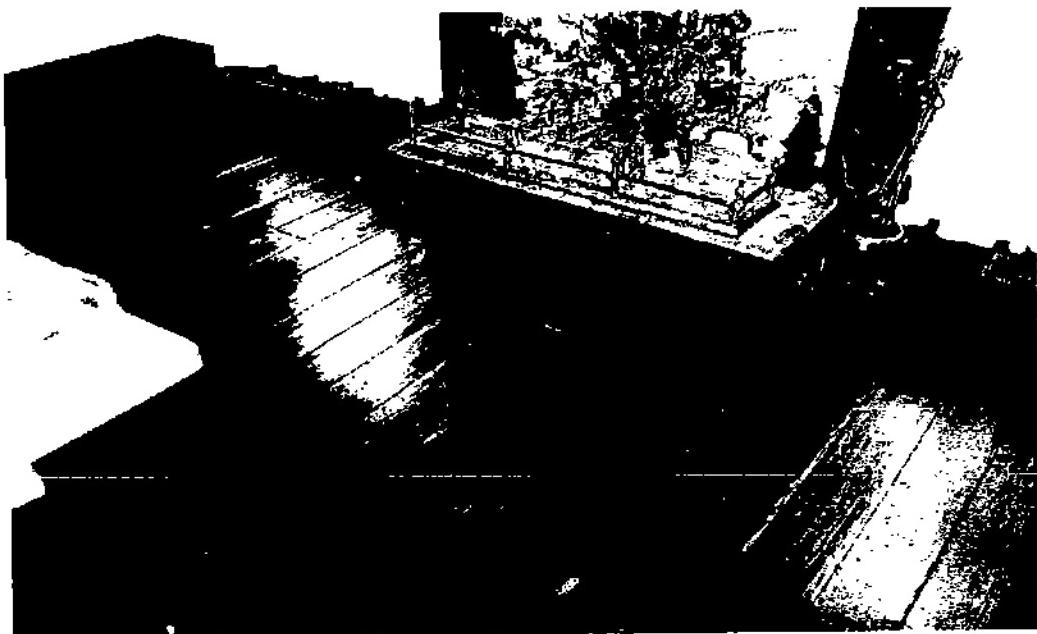
Picture No. 9 – Discoloration of ceiling paint at rear access. Not roof leakage.



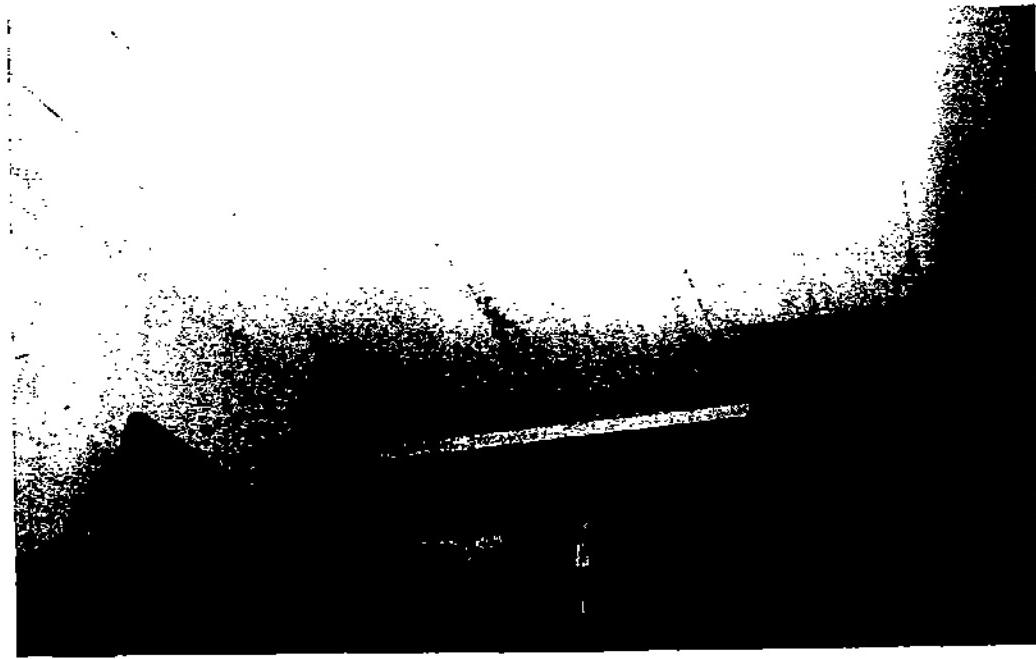
Picture No. 10 – Ceiling damage 1<sup>st</sup> floor right room.

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Picture No. 11 – Floor repair in right room 1<sup>st</sup> floor.



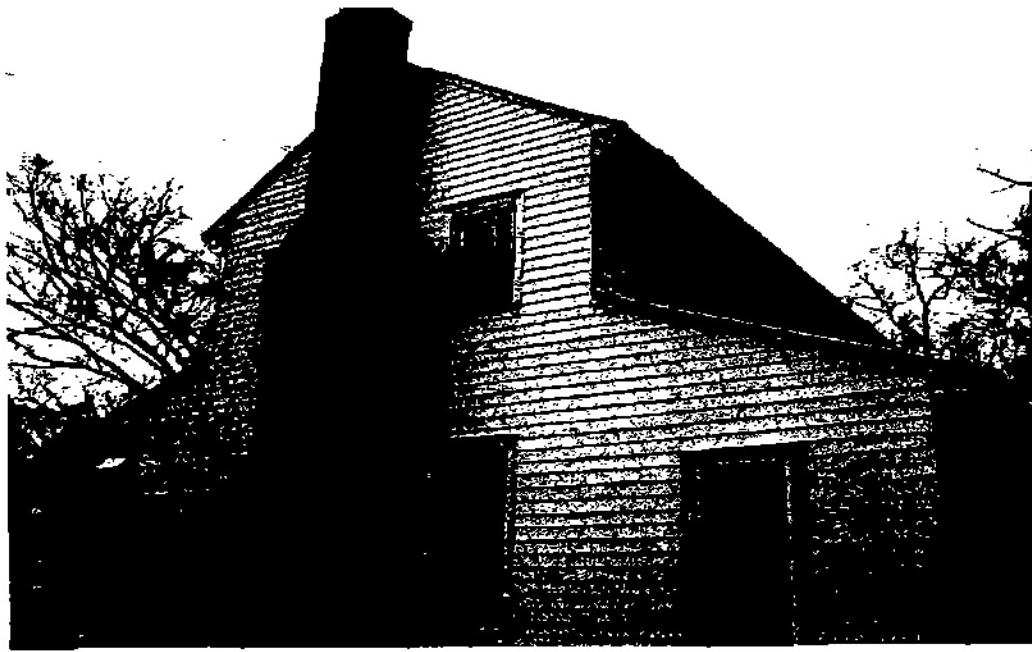
Picture No. 12 – Ceiling Damage in Kitchen above cabinets.

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Picture No. 13 – Damaged roof, rear right corner.



Picture No. 14 – Area of recent roof damage. No damage to siding.

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Picture No. 15 – Typical view of support underneath with no movement noted.  
Crawlspace dry.



Picture No. 16 – Original stone supports. No recent movement.

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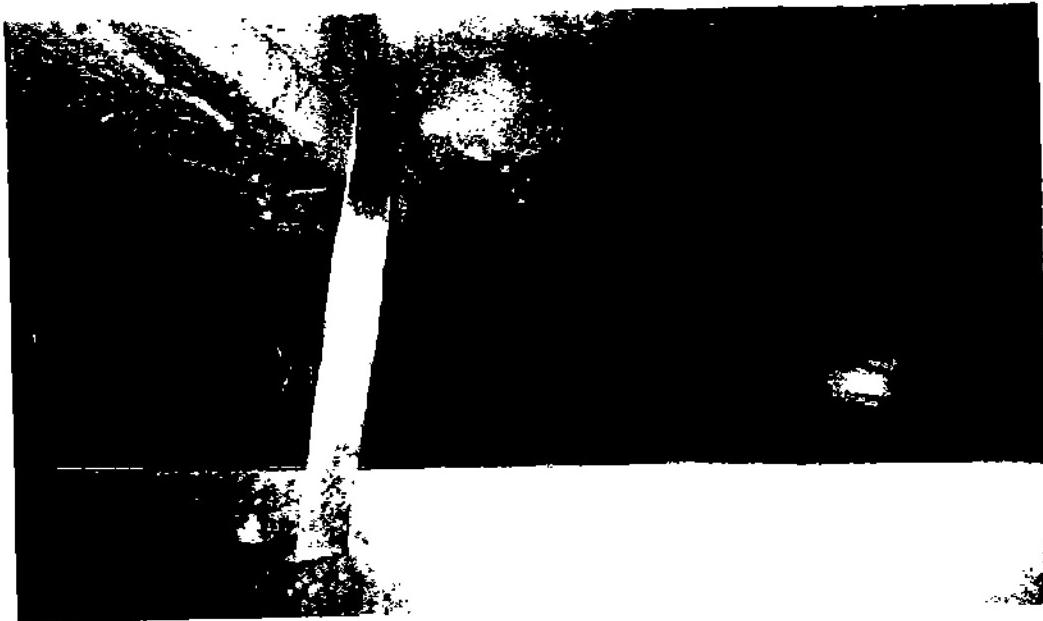
Picture No. 17 – View of insect damage at front right corner. Corner dropped slightly.  
Insect damage in sill.



Picture No. 18 – Insect tubs in floor joist. Joist has been repaired to right side with new joist. Typical in insect damaged area.

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Picture No. 19 – Typical view of insect damage. Joist repaired to left side.



Picture No. 20 – Typical view of some deterioration of stone support with settlement.  
No recent movement noted.